



November 30, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: *Ex Parte* Communication: WC Docket Nos. 10-90, 14-58, 07-135, and CC
Docket 01-92**

Dear Ms. Dortch:

ITTA files this *ex parte* presentation with respect to the draft Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration (Draft) in the above-captioned proceedings.¹

The Draft correctly sets a path to expand the benefits of model-based support for a greater number of households and small businesses living in rural areas. It would do so by: (1) increasing support up to \$200 per location for carriers that are currently authorized to receive A-CAM support (referred to in the draft rules as “Revised A-CAM I” carriers); and (2) providing a new offer of support to legacy rate-of-return carriers that did not previously elect model support or support pursuant to the Alaska Plan (“A-CAM II carriers”).² For both offers, a higher percentage of customers would receive 25/3 Mbps service than was required in the original offer and current authorizations of model-based support and the term of support would run until December 31, 2028, rather than the December 31, 2026 end-date provided under the terms of the existing authorizations of support. In short, the Draft recognizes the benefits of increased access to 25/3 Mbps service and the necessity for sufficient, predictable support to the accepting carriers.

ITTA recommends a modest clarification to the Draft, however, to state expressly that existing A-CAM “glide path” carriers—meaning those carriers that accepted the original A-CAM offer of support for an amount less than the legacy support they received—will be offered a revised offer of support with increased deployment obligations and thus become Revised A-CAM I carriers. While these carriers already are funded at the \$200 per location level and accordingly would not receive an incremental increase in annual per-location support, in accepting the revised offer of support they would commit to deliver 25/3 Mbps service to a

¹ *Connect America Fund et al.*, Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration, FCC-CIRC1812-02 (Public Draft Nov. 21, 2018).

² In addition, the Draft would provide additional funding to companies that remain on the legacy plan, with the expectation that this funding will drive further deployment of 25/3 Mbps broadband service.

higher percentage of eligible locations in exchange for a revised term of support that would expire at the end of 2028, rather than 2026.

By allowing glide path carriers that accepted the original offer of support to accept a revised offer extending their term to 2028, the Commission would promote a uniform approach to model-based companies. All existing A-CAM carriers that accept the revised offer of support would have stable, predictable model-based funding through 2028. More importantly, allowing existing glide path carriers to receive and accept the revised offer would bring 25/3 Mbps service to more eligible locations in their service territories. If, on the other hand, existing glide path carriers are excluded from a revised offer of support, fewer customers in these territories would receive 25/3 Mbps service as compared to customers in Revised A-CAM I carriers' territories.

Notably, extending the revised offer of support to existing glide path carriers would not increase the per-year cost of the A-CAM program, given that glide path carriers by definition do not require an increase in per-location funding to meet the new \$200 per location funding cap. The sole financial change would be to extend the term of support of these electing glide path carriers by an additional two years.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

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